

Application No.: 10/644,903

Docket No.: 10982158-3

REMARKS

Reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks is respectfully requested.

Claims 1, 5-7, and 10-16 are pending. Claims 1 and 16 have been amended to clarify the connection between the specialty/second module and the keyboard/first module and overcome the Examiner's antecedent basis rejection with respect to claim 1. Claim 5 has been amended to correct only matters of form.

The rejection of claims 1 and 5-7 under 35 U.S.C. 112, second paragraph, is believed overcome in view of the foregoing amendments and withdrawal of the rejection is in order.

The rejection of claims 1, 5, 6, 7, 10-13, 15, and 16 under 35 U.S.C. 102(b) as being anticipated by Ganthier et al. (U.S. Patent 5,865,546) is hereby traversed. A rejection based on 35 U.S.C. §102 requires every element of the claim to be included in the reference, either directly or inherently. Ganthier fails to include all elements of claim 1 for at least two reasons.

First, Ganthier fails to disclose circuitry on the specialty module for coupling the first (keyboard, as amended) and second (specialized, as amended) user function signals to the computer. Element 125 of Ganthier, identified by the Examiner as equivalent to the claimed circuitry, is an electrical cable connecting the Ganthier keyboard shell 102 to a computer chassis and not circuitry on the specialty module. For at least this reason, the rejection should be withdrawn.

Further, electrical cable 125 does not even connect the Examiner-identified specialty module (trackball module 140 or scanner module 160) to the computer chassis. Instead, the electrical cable 125 connects the keyboard shell 102 to the computer chassis.

Second, neither the trackball module 140 nor scanner module 160 are directly connected to each other. Rather, as described above, each module 140, 160 connects to the keyboard shell 102. "The keyboard shell 102 includes a plurality of recessed

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openings 104, 110, 120 into which the input device modules 130, 140, 150, respectively, insert." Ganthier at column 3, lines 62-64. For at least this reason, the rejection of claim 1 should be withdrawn.

Based on either of the foregoing reasons, claim 1 is patentable over Ganthier and the rejection should be withdrawn. Claims 5-7, 10-13, and 15 depend, either directly or indirectly, from claim 1, include further important limitations, and are patentable over Ganthier for at least the reasons advanced above with respect to claim 1. The rejection of claims 5-7, 10-13, and 15 should be withdrawn.

With specific reference to claim 5, Ganthier fails to disclose a specialty module including a mechanical coupling structure complementary with a mechanical coupling structure on a keyboard module. Contrary to the Examiner's assertion, the coupling structure 136 of keyboard module 130 is not complementary with the coupling structures 146, 156 of trackball module 140 and keypad module 150. For at least this reason and for those advanced above with respect to claim 1, the rejection of claim 5 should be withdrawn.

With specific reference to claim 6, Ganthier fails to disclose at least the mechanical coupling structure of the keyboard module or specialty module including a cavity as suggested by the Examiner. The Examiner-identified elements 104, 110, 120 of Ganthier are elements of keyboard shell 102 and not a keyboard module or specialty module as claimed. For at least this reason and for those advanced above with respect to claim 1, the rejection of claim 6 should be withdrawn.

With specific reference to claim 13, Ganthier fails to disclose a locking structure for coupling and locking the keyboard module and the specialty module together. The structure indicated by reference numbers 115, 162, and 163 of Ganthier are connectors similar to the connectors connecting the keyboard module 130, trackball module 140, and keypad module 150 to the keyboard shell 102. There is no disclosure in Ganthier of a locking structure. For at least this reason and for those advanced above with respect to claim 1, the rejection of claim 13 should be withdrawn.

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With specific reference to claim 15, Ganthier fails to disclose at least the keyboard module including a side cavity sized to accommodate the specialty module. Keyboard module 13 of Ganthier fails to include a side cavity for the specialty module 160. The Examiner-identified elements 104, 110, 120 of Ganthier are elements of keyboard shell 102 and not a keyboard module or specialty module as claimed. For at least this reason and for those advanced above with respect to claim 1, the rejection of claim 15 should be withdrawn.

Claim 16 is patentable over Ganthier for at least reasons similar to those advanced above with respect to claim 1 and the rejection of claim 16 should be withdrawn.

The rejection of claim 14 under 35 U.S.C. 103(a) as being unpatentable over Ganthier in view of Daly et al. (U.S. Patent 4,969,830) is hereby traversed. As described above, Ganthier fails to disclose all elements of the claimed subject matter and Daly fails to cure the above-noted deficiencies of Ganthier. For at least this reason, the rejection of claim 14 should be withdrawn.

Further, even assuming arguendo the combination of Ganthier with Daly, Ganthier fails to disclose a keyboard module connectable to a specialty module. The combination of references fails to render obvious the claimed subject matter of a keyboard module including a snap lock and a specialty module including snap recess which is engaged by the snap lock. As discussed above with respect to claim 13 from which claim 14 depends, Ganthier fails to disclose a structure for coupling the keyboard module and the specialty module together.

Based on either of the foregoing reasons, claim 14 is patentable over Ganthier and the rejection should be withdrawn.


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All objections and rejections having been addressed, it is respectfully submitted that the present application should be in condition for allowance and a Notice to that effect is earnestly solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 08-2025 and please credit any excess fees to such deposit account.

Respectfully submitted,
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